

Mishcon de Reya
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By ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: SEC v. Galanis, et al.; No. 15 Civ. 7547 (VSB)

Dear Judge Broderick:

I write with respect to the motion of Mishcon de Reya New York LLP (“Mishcon”) to Withdraw as Counsel to Defendant Gary T. Hirst (“Motion”) in the above-captioned action.

The Motion was filed on April 24, 2017. On that same day, Mishcon served the Motion on Mr. Hirst by email (gary@hirstlaw.com), and on his counsel in related criminal and civil matters, Michael Tremonte, Esq., by regular mail and email (mtremonte@shertremonte.com).¹

In our email to Mr. Tremonte, Mishcon asked that Mr. Tremonte inform it if he was not authorized to accept service on behalf of Mr. Hirst so that Mishcon could then notify the Court and take any further steps that Your Honor would require. Mr. Tremonte did not object or refuse to accept service of the Motion on behalf of Mr. Hirst. Indeed, Mr. Tremonte has not responded in any manner to Mishcon’s correspondence.

Pursuant to Local Rule 6.1(b)(2), Mr. Hirst was required to respond to the Motion within 14 days of the date of service – here, on or before May 8, 2017. To date, Mishcon has not received any response from Mr. Hirst (or Mr. Tremonte), nor has Mishcon received a request for additional time to respond to the Motion.

¹ Mishcon is otherwise unaware of Mr. Hirst’s location, and thus currently unable to serve him personally or by mail. As stated in its Memorandum accompanying the Motion, Mr. Hirst long ago stopped communicating with Mishcon, and Mr. Tremonte has now also ceased communicating with Mishcon. See DKT 31 at p. 2.

In light of the foregoing, Mishcon respectfully requests that the Court deem the Motion fully submitted for decision.

Respectfully,

/s/ Vincent Filardo, Jr.
Vincent Filardo, Jr.

Cc: Gary T. Hirst (by email)
Michael Tremonte, Esq. (by regular mail and email)
Nancy A. Brown, Esq. (by email)